REMARKS

Claims 20-25 are currently pending in this application. Claims 1-19 have been canceled without prejudice.

The following remarks put the pending claims in condition for allowance. Applicants respectfully request reconsideration and the timely allowance of the pending claims.

35 U.S.C. § 103(a) Rejections

35 USC § 103(a) Rejection over Saldanha et al. in view of Wical

Claims 20-25 stand rejected under 35 U.S.C. 103(a) for allegedly being unpatentable over Saldanha et al., U.S. Application No. 2003/0167266, (hereinafter "Saldanha") in view of Wical, U.S. Patent No. 5,940,821, (hereinafter "Wical").

Applicants respectfully traverse this rejection. The Office Action states that Saldanha teaches parsing a syntactically ambiguous natural language statement into at least two structured representations. The Office then states that Saldanha fails to teach searching a cross-linked keyphrase database for a keyphrase node representing a third keyphrase. The Office then relies on Wical for teaching searching. The Office then urges that it would have been obvious to combine the teachings of Saldanha and Wical to "disambiguate a syntactically ambiguous natural language statement by finding an exclusive match otherwise designating the search unable to be disambiguated."

Applicants respectfully disagree. Saldanha teaches a method for converting plain text into structure data (see Abstract). Saldanha fails to teach a method of disambiguating a syntactically ambiguous natural language statement in accordance with the instant invention. Specifically, Saldanha fails to teach searching a cross-linked database for a keyphrase node to compare to a first and second keyphrase node generated by parsing the natural language statement into a first and second structured representation. Wical fails to cure these deficiencies. Wical teaches a knowledge base

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search and retrieval system and a method of searching a database of documents. Wical fails to teach searching a cross-linked database for a keyphrase node to compare to a first and second keyphrase node generated by parsing the natural language statement into a first and second structured representation. The Office's reliance on Fig. 4 of Wical is confusing. Fig. 4 depicts a classification of a document on traveling to France and visiting museums and places of interest (see col. 11, lines 45-50). Fig. 4 has absolutely no relation to a method of disambiguating whatsoever.

Further, the Office's recitation of the definition of disambiguate is confusing. Applicants have not invented the idea of disambiguating but merely a method for disambiguating a natural language statement. The Office states "if only one structured representation of two keyphrases matches the third keyphrase then by definition the structured representation is disambiguated." However, the Office has failed to cite any teaching or suggestion in either Saldanha or Wical for searching a cross-linked keyphrase database for a keyphrase node representing a third keyphrase and then comparing the third keyphrase to the first and second keyphrases.

The Office is reminded that a proper obviousness rejection must teach each and every limitation. MPEP 2143.03 quotes relevant case law.

> To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All words in a claim must be considered in judging the patentability of that claim against the prior art." *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988).

Even if the combination of references did teach all the limitations of the claims, which it does not, there is no motivation to combine the references. Saldanha teaches generating parse trees from a natural language statement. The parse trees are mapped onto instance trees. The instance trees are pruned and then the instance tree which

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reflects the best map is chosen for execution. Saldanha describes eight specific criteria for picking the best map (see paragraphs [0258] through [0265] starting on page 19). The choice of best map seems to be related to disambiguating the natural language statement. Thus, Saldanha is complete and one of ordinary skill in the art would not be motivated to look to other sources or teachings to implement a disambiguating function into the method of Saldanha.

> To prevent the use of hindsight based on the invention to defeat patentability of the invention, this court requires the examiner to show a motivation to combine the references that create the case of obviousness. In other words, the examiner must show reasons that the skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. *In re Rouffet*, 149 F.3d 1350, 47 USPQ2d 1453 (Fed. Cir. 1998). In determining whether such a suggestion can fairly be gleaned from the prior art, the full field of the invention must be considered for the person of ordinary skill is charged with knowledge of the entire body of technological literature, including that which might lead away from the claimed invention. *In re Dow Chemical Co.*, 837 F.2d 469, 5 USPQ2d 1529 (Fed. Cir. 1988).

As highlighted above, Saldanha and Wical, alone or in combination, fail to teach or suggest a method of disambiguating a natural language statement comprising searching a cross-linked database for a keyphrase node to compare to a first and second keyphrase node generated by parsing the natural language statement into a first and second structured representation. Further, there is insufficient motivation to combine the references. Accordingly, since the cited combination fails to teach or suggest each and every element of the invention and since there is insufficient motivation to combine the references, Applicants respectfully request that the rejection of claims 20-25 under 35 U.S.C. § 103(a) be withdrawn and the timely allowance of the pending claims.

CONCLUSION

Applicants believe this response to be a full and complete response to the Office Action. In view of the foregoing, Applicants respectfully request reconsideration and allowance of claims 20-25. As the application is believed to be in condition for allowance, Applicants respectfully request a Notice of Allowability. The Examiner is invited to contact the undersigned representative should any further issues arise

Respectfully submitted,

DECHERT LLP

Date: _September 1, 2004_   _John W. Ryan_

John W. Ryan
Reg. No. 33,771

Craig P. Lytle
Reg. No. 53,934

Dechert LLP
1775 Eye Street, N.W.
Washington, D.C. 20006
Telephone (202) 261-3375
Fax (202) 261-3333